

# **WISHA REGIONAL DIRECTIVE**

**WISHA Services**

**Department of Labor and Industries**

## **22.80**

# **Qualifications of Maritime Inspectors**

**Date: May 9, 2005**

### **I. Background**

The Department of Labor and Industries conducts inspections and consultations in a variety of maritime and waterfront-related activities. Historically, these activities have been performed by a specialized staff with periodic support from other inspectors and consultants. This policy grows out of a desire to clearly identify which staff are qualified to perform which activities related to the waterfront, and to provide a means of creating and maintaining an inventory of appropriately skilled staff.

This directive provides guidance regarding the basic content of such lists and the process to maintain them.

### **II. Scope and Application**

This WISHA Regional Directive (WRD) applies to all WISHA enforcement and consultation activities involving maritime inspections and/or consultations. It is substantively the same as WISHA Interim Operations Memoranda (WIOM) 99-1-G issued on January 29, 1999, which it replaces and rescinds.

### **III. Interpretive Guidance**

- A. *If an employer has a maritime SIC code, will the inspection/consultation require an inspector/consultant that is on the marine and dock list?*

Not necessarily, you would have to look at the situation; for example, a complaint regarding workplace violence at a marine terminal involving a security guard in the parking lot would not require a qualified maritime inspector to investigate.

Now if the inspector would be required to enter the marine terminal where cargo-handling operations were taking place, then that inspector should be qualified for that category on the marine and dock list.

Another example would be a complaint about workers not wearing a personal flotation device at a recreational boat marina. This would not require the inspector to be on the marine and dock list, as this is an area where the general

public is allowed to be in and someone with special maritime skills would not be required to investigate the complaint.

Generally speaking, if the inspector/consultant needs to enter a facility like a shipyard, boatyard, marine terminal, a commercial diving site, or a boatbuilder's facility that manufactures boats greater than 65 feet in length, then the inspector/consultant should be on the marine and dock list.

*B. What are the categories for the Marine and Dock Inspector/Consultant list and what level of experience do you need in order to be placed on the list?*

WISHA staff engaged in maritime activities – whether regularly or periodically -- will be grouped according to the following categories:

*1. Shipyards & Boatyards*

*a) Comprehensive.*

This category describes a journey-level maritime safety inspector or consultant able to conduct independent comprehensive inspections or consultations within SIC 3731 and 3732.

*b) Basic.*

This category describes an inspector or consultant who has received basic training in the shipbuilding/boatbuilding industry and is able to function as part of a team within SIC 3731 or 3732. He or she may have some level of specialization and be able to conduct limited scope activities within that specialized area, but cannot be expected to conduct a comprehensive inspection or consultation independently.

*c) Hygiene.*

This category describes an industrial hygienist or consultant who has received basic training in the shipbuilding/boatbuilding industries, with an emphasis on industrial hygiene-related hazards. He or she may function as a member of a team or may conduct a comprehensive industrial hygiene inspection or consultation within SIC 3731 and 3732.

*2. Longshore, Stevedore and related operations (including Container, Bulk, Break bulk, Ro/Ro, Log Loading, Warehousing, Docks and Piers)*

*a) Comprehensive.*

This category describes a journey-level maritime inspector or consultant able to conduct independent comprehensive inspections or consultations in relation to active longshore/stevedoring operations.

*b) Basic.*

This category describes an inspector or consultant who has received basic training in the longshore/stevedoring industry and is able to function as

part of a team on the docks. He or she may have some level of specialization and be able to conduct limited scope activities within that specialized area, but cannot be expected to conduct a comprehensive inspection or consultation independently.

c) *Hygiene.*

This category describes an industrial hygienist or consultant who has received basic training in the longshore/stevedoring industry, with an emphasis on industrial hygiene-related hazards. He or she may function as a member of a team or may conduct a comprehensive industrial hygiene inspection or consultation on the docks.

3. *Commercial Diving*

This category describes a journey-level maritime inspector, industrial hygienist or consultant able to conduct independent comprehensive inspections or consultations in relation to commercial diving operations (not involving underwater activity on his or her part).

4. *Vessel Operation*

This category describes a journey-level maritime inspector or consultant able to conduct independent comprehensive inspections or consultations in relation to vessel operations, sea worthiness, stability and overall safety afloat.

5. *Crane Inspections (including overhead, container, gantry, mobile and spout/sucker)*

a) *Comprehensive.*

This category describes a journey-level crane inspector or consultant able to inspect the crane itself, as well as any necessary documentation. Able to conduct such inspections or consultations in relation to shipbuilding, boat-building, or longshore/stevedore activities, he or she must also be qualified at the basic level in the applicable maritime industry.

b) *Basic.*

This category describes those inspectors and consultants who have been given basic training in the essential crane enforcement issues and are able to readily inspect key operating practices and equipment, as well as the presence of the necessary paperwork.

6. *Marinas (all waters)*

This category describes a journey-level maritime inspector or consultant, who is able to conduct independent comprehensive inspections or consultations in relation to marina operation.

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*C. How will the maritime list be maintained?*

The maritime specialist in WISHA P&TS will maintain lists for each of the above categories. Inspectors and consultants will be placed on the list after the appropriate supervisor and the maritime specialist agree that the employee demonstrates the necessary qualifications.

1. Supervisors may suggest any inspector, hygienist or consultant as a candidate to be added to one of the lists. If the maritime specialist in WISHA P&TS agrees, the individual will be added. If the maritime specialist does not believe adding the individual to the list would be appropriate, he or she will discuss the issue with the supervisor (and with the individual in question, if they desire) and they will determine whether additional training or other actions are appropriate. If the supervisor and the maritime specialist are unable to resolve a disagreement over whether an individual should be added to one of the lists, the issue will be resolved by the Senior Program Manager, WISHA P&TS, in consultation with regional management.
2. The maritime specialist may subdivide the lists (especially in relation to “basic” and “hygiene” categories) to more appropriately reflect areas of specialization.
3. The maritime specialist will evaluate the program at least annually to determine whether the categories should be modified to address additional areas of specialization or other issues.

*D. Can the supervisor assign staff to maritime facilities if that person is not on the list?*

Supervisors must not assign staff to activities within the areas covered by the lists unless the individual appears on the list in question (or unless the maritime specialist in WISHA P&TS agrees to add the individual to the list). This does not prevent supervisors from assigning individuals who are being trained to accompany qualified individuals as part of that training (any personal safety issues in such cases must be addressed in accordance with applicable internal safety and health guidelines).

Approved: \_\_\_\_\_  
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WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 -- or by telephone at (360) 902-5503. You may also review policy information on the WISHA Website (<http://www.lni.wa.gov/Safety/>).